

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

2004 AUG 11 P 2:00 DOCKET NO. 04 11572 JLT

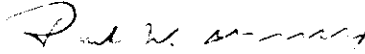
\*\*\*\*\*  
SUSAN COONEY,  
Plaintiff  
v.  
HUMANISTIC PSYCHOLOGY INSTITUTE,  
d/b/a SAYBROOK INSTITUTE and  
MAUREEN O'HARA, Individually  
Defendants  
\*\*\*\*\*

**PLAINTIFF SUSAN COONEY'S MOTION TO EXTEND DEADLINE TO OPPOSE  
DEFENDANTS' MOTION TO DISMISS AND MOTION TO TRANSFER  
(WITH ASSENT OF DEFENDANTS' COUNSEL)**

Plaintiff Susan Cooney, by her counsel, requests that the Court extend the deadline for plaintiff to oppose Defendant O'Hara's Motion to Dismiss and Defendants' Motion to Transfer until August 27, 2004. As grounds in support of this motion, plaintiff states as follows:

1. Defendants, by their counsel, filed the aforementioned motion electronically on August 3, 2004. Pursuant to the Local Rules, plaintiff's opposition is due on August 17, 2004.
2. Counsel to Susan Cooney, Paul Morenberg, is scheduled to begin trial in Boston Municipal Court on Monday, August 16, 2004 in the case of Ruddy et al v. Feinstein et al, Docket No. 200201CV-004268. The trial is expected to last two to three days.
3. Due to the above-mentioned trial, Plaintiff's counsel requires additional time to prepare an Opposition to Defendants' motion. Plaintiff's counsel has conferred with defendants' counsel, Grace V. Bacon, who assents to plaintiffs' request for a ten-day extension.

WHEREFORE, Plaintiff respectfully requests that the Court extend the time for Plaintiff to oppose Defendants' Motion to Dismiss and Motion to Transfer until August 27, 2004.



E. Steven Coren, BBO # 099740  
Paul W. Morenberg, BBO # 631101  
Kerstein, Coren, Lichtenstein & Finkel, LLP  
233 Needham Street  
Newton, MA 02464  
(617) 969-7139

Assented to by defendants' counsel (by telephone, after review of motion by facsimile):

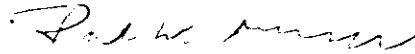


Michael F. Aylward, BBO # 024850  
Grace V. Bacon, BBO # 640970  
Morrison Mahoney LLP  
250 Summer Street  
Boston, MA 02210  
(617) 439-7500

Dated: August 10, 2004

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by first class mail and by facsimile on August 10, 2004.



Paul W. Morenberg, BBO # 631101